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October 18, 2023

The Honorable Nicholas G. Garaufis
 United States District Court
 Eastern District of New York
 225 Cadman Plaza East
 Brooklyn, New York 11201

Re: United States v. Keith Raniere
 Case No.: 18-Cr-00204-NGG

Dear Judge Garaufis:

On September 26, 2023, the Court granted the defendant's request for an extension to file our Reply, as Mr. Raniere's incarceration has continued to pose logistical challenges to enable him to easily participate with our office in the drafting of his response.

We are seeking to request an additional extension to afford additional time for the undersigned counsel to engage in further consultation with Plaintiff regarding the filing of his Response. Although this is the third request by the undersigned counsel on behalf of Plaintiff for an extension to file a Reply, we feel it necessary considering his current circumstances and the difficulties they pose to facilitating attorney-client communication.

Currently, Mr. Raniere has been on lockdown since our last request and we have not been able to contact him or communicate with him at all. We also have no knowledge as to when we can expect to be able to speak to him again. Once we are advised that the lockdown has been lifted, we will be able to resume communication with him. Since we cannot reasonably speculate on when we will be able to once again consult with our client, the undersigned counsel respectfully requests the Court for an extension to file the Response until November 30, 2023.

We thank you for your consideration of our request.

Respectfully submitted,

Arthur L. Aidala, Esq.
 Aidala, Bertuna & Kamins, P.C.
 Attorney for Keith Raniere

cc: AUSA Tanya Hajjar